

1 WRIGHT, FINLAY & ZAK, LLP

2 Darren T. Brenner, Esq.

3 Nevada Bar No. 8386

4 Lindsay D. Dragon, Esq.

5 Nevada Bar No. 13474

6 7785 W. Sahara Ave., Suite 200

7 Las Vegas, NV 89117

8 (702) 637-2345; Fax: (702) 946-1345

9 dbrenner@wrightlegal.net

10 ldragon@wrightlegal.net

11 *Attorneys for Plaintiff, U.S. Bank National Association, as Trustee for the GSAMP Trust 2006-*
12 *HE2 Mortgage Pass-Through Certificates, Series 2006-HE2*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 U.S. BANK NATIONAL ASSOCIATION, AS
16 TRUSTEE FOR THE GSAMP TRUST 2006-
17 HE2 MORTGAGE PASS-THROUGH
18 CERTIFICATES, SERIES 2006-HE2,

19 Plaintiff,

20 vs.

21 CHICAGO TITLE INSURANCE COMPANY,

22 Defendants.

Case No.: 2:19-cv-01728-GMN-VCF

**STIPULATION TO EXTEND TIME TO
RESPOND TO MOTION TO STAY
CASE [ECF NO. 31]**

(First Request)

23 Plaintiff, U.S. Bank National Association, as Trustee for the GSAMP Trust 2006-HE2
24 Mortgage Pass-Through Certificates, Series 2006-HE2 (“U.S. Bank”) and Defendant Chicago
25 Title Insurance Company (“Chicago Title”, collectively, the “Parties”), by and through their
26 undersigned counsel, stipulate and agree as follows, subject to the approval of the District Court:

- 27 1. On August 18, 2022, Chicago Title filed a Motion to Stay Case [ECF No. 31];
- 28 2. U.S. Bank’s deadline to respond to Chicago Title’s Motion to Stay Case is currently
September 1, 2022;
3. U.S. Bank’s counsel is requesting an extension until Monday, October 3, 2022, to file
its response to the pending Motion as counsel for U.S. Bank will be out of the country
for the Labor Day holiday and will need additional time to respond to the points and
authorities cited in the pending Motion upon counsel’s return;

- 1 4. Counsel for Chicago Title does not oppose the requested extension;
2 5. This is the first request for an extension which is made in good faith and not for
3 purposes of delay.

4 **IT IS SO STIPULATED.**

5 DATED this 1st day of September 2022.

DATED this 1st day of September 2022.

6 WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN LLP

7
8 /s/ Lindsay D. Dragon, Esq.

/s/ Kevin Sinclair, Esq.

9 Lindsay D. Dragon, Esq.
10 Nevada Bar No. 13474
7785 W. Sahara Ave., Suite 200
Las Vegas, NV 89117
11 *Attorneys for Plaintiff*

Kevin Sinclair, Esq.
Nevada Bar No. 12277
16501 Venture Boulevard, Suite 400
Encino, California 91436
12 *Attorneys for Defendant*

13
14
15
16 **IT IS SO ORDERED.**

17
18 Dated this 1 day of September, 2022

19
20
21 
22 Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT
23
24
25
26
27
28